

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TQ DELTA, LLC,

Plaintiff,

v.

**COMMSCOPE HOLDING COMPANY, INC.,
COMMSCOPE INC., ARRIS US HOLDINGS,
INC., ARRIS SOLUTIONS, INC., ARRIS
TECHNOLOGY, INC., and ARRIS
ENTERPRISES, LLC**

Defendants.

CIV. A. NO. 2:21-CV-310-JRG
(Lead Case)

TQ DELTA, LLC,

Plaintiff,

v.

**NOKIA CORP., NOKIA SOLUTIONS AND
NETWORKS OY, and NOKIA OF AMERICA
CORP.,**

Defendants.

CIV. A. NO. 2:21-CV-309-JRG
(Member Case)

**JOINT STIPULATION REGARDING THE PRODUCTION OF CERTAIN
DOCUMENTS FROM TQ DELTA**

Plaintiff TQ Delta, LLC (“TQ Delta”) and Defendants Nokia Corp., Nokia Solutions and Networks Oy and Nokia of America Corp. (“Nokia Defendants”) (collectively, “Parties”), by and through their counsel of record, stipulate as follows:

The Parties have agreed and stipulated to the qualified production of unredacted financial documents and LLC Agreements subject to Nokia’s Motion to Compel Discovery From TQ Delta, Dkt. 201.

The Parties have agreed that TQ Delta shall produce the unredacted versions of such documents by Tuesday, August 2, 2022, and Nokia has agreed to restrict the confidentiality

designation to “AEO-OUTSIDE COUNSEL ONLY,” meaning that Nokia will not disclose the unredacted versions of such documents to any individual encompassed in paragraph 5(c) of the governing Protective Order (Dkt. No. 61).

Accordingly, the Parties have agreed to be bound by the terms of this stipulation.

STIPULATED AND AGREED TO BY ALL PARTIES:

Dated: August 1, 2022

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Respectfully submitted,

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**ATTORNEYS FOR THE NOKIA
DEFENDANTS**

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this this August 1, 2022, with a copy of this document via CM/ECF.

/s/ William E. Davis, III
William E. Davis, III